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Jaime Retiguin Barba, Sr.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Karla Gonzalez and Jaime
Retiguin Barba Sr.,

Plaintiffs,

v.

Allied Collection Services, Inc.,

Defendant.

Case No.: 2:16-cv-02909-MMD-VCF

**Stipulation to Extend Time for
Plaintiffs to Respond to Defendant's
Motion for Summary Judgment and
for the Parties to file their Replies

(First Request)**

1 IT IS HEREBY STIPULATED between Plaintiffs Karla Gonzalez and Jaime
2 Retiguin Barba Sr. (“Plaintiffs”) and Defendant Allied Collection Services, Inc.
3 (“Defendant,” and together with Plaintiffs, the “Parties”) as follows: On July 12,
4 2018, Defendant filed its Amended Motion for Summary Judgment. ECF No. 70.
5 The deadline for Plaintiffs’ response is August 2, 2018. *Id.* Plaintiffs request a
6 seven-day extension to file their response in opposition to Defendant’s motion in
7 part because the parties intend to meet and confer about Defendant’s position on the
8 running balances of the original creditors’ accounts relevant to this case, as ordered
9 by this court. *See* ECF No. 71. The Parties plan to meet and confer in the next few
10 days. This is Plaintiffs’ first request for an extension of this deadline.

11 Relatedly, the Parties agree that their reply briefs to their cross motions for
12 summary judgment should be due on the same date. ECF Nos. 58, 70. Plaintiffs’
13 reply is due on August 8, 2018 while Defendant’s reply will be due 14 days after
14 Plaintiffs’ response is filed. *See Id.*; LR 7-2. Otherwise, the briefing schedule would
15 disadvantage Plaintiffs by giving Defendant the last word on summary judgment.

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IT IS THEREFORE STIPULATED between the Parties as follows:

- (1) Plaintiffs' response to Defendant's motion, ECF No. 70, is due on or before **August 9, 2018**;
- (2) Both Parties' replies in support of their respective motions, ECF Nos. 58, 70, will be due on or before **August 27, 2018**.

DATED this 31st day of July 2018.

KAZEROUNI LAW GROUP, APC

By: /s/ Michael Kind
Michael Kind
6069 South Fort Apache Road, Suite 100
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THE LAW OFFICE OF VERNON NELSON

By: /s/ Vernon A. Nelson
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Attorneys for Defendant

IT IS SO ORDERED.



UNITED STATES DISTRICT JUDGE

Dated: July 31, 2018

CERTIFICATE OF SERVICE

I HEREBY CERTIFY pursuant to Rule 5 of the Federal Rules of Civil Procedure that on July 31, 2018, the foregoing Stipulation was served by email to all parties appearing in this case.

By: /s/ Michael Kind
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